

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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ORBIS GLOBAL EQUITY LE FUND :  
(AUSTRALIA REGISTERED), ORBIS :  
GLOBAL EQUITY FUND (AUSTRALIA :  
REGISTERED), ORBIS GLOBAL :  
BALANCED FUND (AUSTRALIA :  
REGISTERED), ORBIS SICAV, ORBIS :  
INSTITUTIONAL FUNDS LIMITED, ORBIS :  
GLOBAL EQUITY FUND LIMITED, ORBIS :  
INSTITUTIONAL GLOBAL EQUITY L.P., :  
and ORBIS OEIC, :  
: No. 1:21 Civ. 6590 (RJD) (SJB)

Plaintiffs, :

v. :

VALE S.A., MURILO FERREIRA, FABIO :  
SCHVARTSMAN, LUCIANO SIANI PIRES, :  
GERD PETER POPPINGA, and LUIZ :  
EDUARDO FROES DO AMARAL OSORIO, :  
:

Defendants. :

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**NOTICE OF WITHDRAWAL AS COUNSEL**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Christopher M. Joralemon, defendants Vale S.A., Murilo Ferreira, Fabio Schvartsman, Luciano Siani Pires, Gerd Peter Poppinga, and Luiz Eduardo Froes do Amaral Osorio (collectively, “Defendants”) will move this Court for an Order permitting the withdrawal of Randy M. Mastro and Mark A. Kirsch as counsel for Defendants in the above-captioned action. In support of such application, and pursuant to Local Rule 1.4 of the United States District Courts for the Southern and Eastern District of New York, undersigned counsel states the following: Gibson, Dunn & Crutcher LLP continues to serve as counsel of record for Defendants in this action.

Dated: December 30, 2022  
New York, New York

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Christopher M. Joralemon

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*Attorneys for Defendants*